

WORK PLAN

**Debris Pile Area Remediation
80 Steel Street
Rochester, New York**

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Pesticides & Toxic Substances Branch

**Ben Weitsman of Rochester, LLC and
Weitsman Rochester Realty, LLC**

August 2014

 **O'BRIEN & GERE**



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Pesticides & Toxic Substances Branch

August 29, 2014

Mr. John Gorman
Chief-Pesticides and Toxic Substances Branch
United States Environmental Protection Agency-Region 2
2890 Woodbridge Avenue
Edison, New Jersey 08837-3679

Ms. Judith A. Enck
Regional Administrator
United States Environmental Protection Agency-Region 2
290 Broadway, 26th Floor
New York, New York 10007-1866

RE: Notification of Self-Implementation of On-Site Cleanup and Disposal of PCB Remediation Waste
Ben Weitsman of Rochester, LLC/Weitsman Rochester Realty, LLC
80 Steel Street
Rochester, New York

Dear Mr. Gorman and Ms. Enck:

The purpose of this letter is to advise that a Self-Implementing On-Site Cleanup and Disposal of PCB Remediation Waste Work Plan (Work Plan) for the next phase of remediation at the above referenced site is being submitted for review and approval. The site Owner considers this letter and the Work Plan to be notification of self implementation of on-site cleanup and disposal of PCB remediation waste pursuant to 40 CFR 761.61 (a)(3)(i). Included within the Work Plan is certification pursuant to 40 CFR 761.61 (a)(3)(i)(E).

Your prompt response is greatly appreciated regarding your review and approval of the Work Plan. Should you have any questions, please contact me via telephone at 585-295-7709 or via e-mail at Kevin.Ignaszak@obg.com.

Sincerely,

Kevin D. Ignaszak, P.E.
Senior Project Manager

Attachment: Debris Pile Area Remediation Work Plan

cc. James Haklar-USEPA Region 2 w/attachment
Mike Khalil - NYSDEC Region 8 w/attachment
Doreen Simmons- Hancock and Estabrook
Doug Crawford, PE - O'Brien & Gere
Pete Grevelding, PE - O'Brien & Gere

2014 SEP -2 AM 11:43
EPA REGION 2
CORRESPONDENCE
CONTROL OFFICE

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LIST OF ACRONYMS/ABBREVIATIONS

ASTM	American Society for Testing and Materials
bgs	below ground surface
CFR	Code of Federal Regulations
CY	Cubic yards
DOT	Department of Transportation
ELAP	Environmental Laboratory Accreditation Program
ft	foot or feet
JSA	Job Safety Analysis
GPS	Global Positioning System
HASP	Health and Safety Plan
IDW	investigation-derived waste
mg/kg	milligram per kilogram
mg/L	milligrams per liter
NYS	New York State
NYSDEC	New York State Department of Environmental Conservation
NYSDOH	New York State Department of Health
OSHA	Occupational Safety and Health Administration
Part 376	New York State Codes, Rules and Regulations; Title 6, Chapter IV, Subpart 376
PCB	polychlorinated biphenyl
PID	photoionization detector
ppm	parts per million
PPE	personal protective equipment
QA/QC	Quality Assurance/Quality Control
Site	80 Steel Street, Rochester, New York
TCLP	Toxicity Characteristic Leaching Procedure
TSCA	Toxic Substances Control Act
U.S.	United States

USCS	Unified Soil Classification System
USEPA	United States Environmental Protection Agency

OWNER CERTIFICATION


CERTIFICATION
PURSUANT TO 40 CFR 761.61 (a)(3)(i)(E)

Regarding the Self-Implementing Clean-up Work Plan, dated August 29, 2014, for the Debris Pile Remediation Area located at 80 Steel Street, Rochester, New York:

I hereby certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site as prepared by O'Brien & Gere Engineers, Inc. are on file and available for USEPA inspection at the following location:

Ben Weitsman of Rochester, LLC
80 Steel Street
Rochester, New York 14606

Weitsman Rochester Realty, LLC (Owner)
Ben Weitsman of Rochester, LLC (Operator)
80 Steel Street, Rochester, New York 14606



Aaron Weiner, Authorized Agent
Facility General Manager
80 Steel Street
Rochester, NY 14606



Date

1. INTRODUCTION

This *Debris Pile Area Remediation Work Plan* (Work Plan) has been prepared by O'Brien & Gere on behalf of Ben Weitsman of Rochester, LLC and Weitsman Rochester Realty, LLC (Weitsman) and at the request of the United States Environmental Protection Agency (USEPA), in consultation with the New York State Department of Environmental Conservation (NYSDEC) to document the procedures for remediating soils both below and in the general area of the former piles of staged debris at 80 Steel Street (Site), located in the City of Rochester, New York. The piles of staged debris were removed during the fall of 2013 and winter/spring of 2014 in accordance with the USEPA-approved self-implementing PCB cleanup Work Plan (approval dated December 31, 2013). Confirmatory soil sampling conducted as part of removing the staged debris has identified four limited surface soil locations which exhibit total polychlorinated biphenol (PCB) concentrations >48 milligrams/kilogram (mg/kg), or parts per million (ppm), and ten sample locations which exhibit total PCB concentrations >10 ppm.

The work described in this proposed Work Plan is designed to remediate the soils exhibiting total PCBs >10 ppm via off Site disposal based on total PCB concentration; and to remediate remaining soils exhibiting total PCB concentrations >1 ppm and ≤10 ppm via on Site management with the installation of an asphalt cap; a gravel cap on the sloped area within AOC-5; and with appropriate deed restriction. O'Brien & Gere and Weitsman's legal counsel met with representatives of the NYSDEC on April 9, 2014 to discuss the results of the work completed to date, the confirmatory soil sample results, and the proposed remedial plans concerning the Site. As a result of the meeting, the NYSDEC indicated verbally their general concurrence with the remedial approach presented within this Work Plan.

The Work Plan has been prepared consistent with the requirements of the following applicable sections of Title 40 of the Code of Federal Regulations, Subpart 761 PCB Remediation Waste (40CFR 761.61):

- 40 CFR 761.61(a)(4)(A)-cleanup level for high-occupancy area where bulk PCB remediation waste remains at concentrations >1 ppm and ≤10 ppm
- 40 CFR 761.61(a)(5)(i)(B)(2)(ii) and 40 CFR 761.61(a)(5)(v)(A)-disposal of bulk PCB remediation waste ≤50 ppm
- 40 CFR 761.61(a)(5)(i)(B)(2)(iii) and (iv)-disposal of bulk PCB remediation waste greater than or equal to 50 ppm
- 40 CFR 761.61(a)(5)(v)(A)-disposal of personal protective equipment and non liquid cleaning materials
- 40 CFR 761.61(a)(7)-asphalt cap requirements
- 40 CFR 761.61(a)(8)-deed restriction for asphalt cap
- 40 CFR 761.62 - characterization sampling
- 40 CFR 761.79(c)(2)-decontamination of movable equipment utilizing double wash-rinse, confirm wipe program.

2. SITE HISTORY AND DESCRIPTION

2.1 SITE LOCATION

The Site is located at 80 Steel Street in the City of Rochester, Monroe County, New York. A Site Location map is provided as [Figure 1](#). The Debris Pile Area Remediation is generally situated in the area along the central east side to southeast corner of the Site.

2.2 SITE HISTORY

Weitsman purchased the Site and its scrap metal operations in August 2011. The debris piles were present when Weitsman purchased the Site.

During a routine Site walkover by NYSDEC in the summer of 2012, NYSDEC inquired of Weitsman as to the Debris Piles. As a result and in direct consultation with NYSDEC, Weitsman subsequently performed four rounds of characterization sampling of the Debris Piles from August 9, 2012 through June 19, 2013.

Weitsman submitted the results of the characterization sampling, as well as work plans and responses to requests for additional information, to both USEPA and NYSDEC. These submissions included:

- August 13, 2013 - Debris Pile Characterization Report
- October 1, 2013 - Debris Pile Management Work Plan
- October 31, 2013 - Notification of Self-Implementation of On-Site Cleanup and Disposal of PCB Remediation including Owner Certification
- November 25, 2013- E-Mail Clarification and Characterization Sample Summary Results Table
- November 29, 2013 - Waste Management's Mill Seat Landfill Permit
- December 1, 2013 - Seneca Meadows, Inc. Landfill Permit and Approval Letter to Accept Non-Hazardous PCB Remediation Waste
- January 16, 2014 Confirmatory Soil Sampling Plan.

USEPA approved the August 13, 2013 Debris Pile Characterization Report, the October 1, 2013 Debris Pile Management Work Plan and the October 31, 2013 Notification of Self-Implementation of On-Site Cleanup and Disposal of PCB Remediation on December 31, 2013. NYSDEC approved the Confirmatory Soil Sampling Plan on February 3, 2014.

2.3 CURRENT SITE CONDITIONS AND USE

The Site is an active scrap metal processing and recycling facility owned and operated by Weitsman. A variety of scrap metal is brought to the facility for recycling including ferrous and non-ferrous metals.

An August 2014 staking of the eastern property line revealed that current formal title to a narrow strip of land within AOC 5 is held by the adjacent railroad who has been notified by Weitsman (see [Figure 2](#)). This area has been historically used by Weitsman and previous owners. Weitsman is in cooperative communication with the railroad.

The Site is bordered by 80 Steel Street to the west, Bickford Street and a bus garage to the west-northwest, Ferrano Street to the north, railroad tracks to the east, and a commercial business to the south on Lyell Avenue. The Site is relatively flat in topography, is dirt/gravel/pavement covered, and improved with two buildings. The weigh scale and office are situated on Steel Street where customers bring scrap metal into the facility and then drive to various locations on the Site to unload based upon the type of scrap being delivered.

2.4 PREVIOUS SITE ACTIVITIES

The five staged Debris Piles, or Areas of Concern (AOC), were excavated, loaded and transported off Site for disposal at permitted disposal facilities as summarized below:

- The portions of the Debris Piles exhibiting PCBs >48 ppm were disposed of at Chemical Waste Management's Model City Landfill. A total of 130 tons of hazardous PCB bulk remediation debris were disposed from November 13-15, 2013

- Portions of the Debris Piles exhibiting PCBs <48 ppm were disposed of at Seneca Meadows, Inc. Landfill. Approximately 9,146 tons of non-hazardous PCB Bulk Remediation Debris were disposed from January 15-March 7, 2014 and May 10-May 15, 2014
- Confirmatory soil samples were collected from the surface soils within the Debris Pile footprints and the access road situated between Piles 1 through 4 and Pile 5
- A total of 312 gas cylinders contained within the Debris Pile were inspected, segregated, degassed as necessary, and punctured/opened on March 31-April 3, April 7-8, and April 11, 2014. These cylinders were transported and disposed of at Seneca Meadows as non-hazardous PCB bulk remediation debris on June 9, 2014
- Temporary perimeter construction fencing, hay bales and a gravel access road were installed. The gravel road was installed at the request of USEPA to provide separation between vehicles using the access road and the surface soils exhibiting total PCBs >1 ppm
- The remaining 272 tons of staged, non-hazardous debris that was previously intermixed with the gas cylinders within the Debris Pile was loaded and transported off Site to Seneca Meadows for disposal as non-hazardous PCB bulk remediation debris from June 19-June 24, 2014.

2.4.1 Soils Exhibiting Total PCB Concentrations Above 48 ppm and Requiring Removal

A total of four confirmatory surface soil sample results exhibited total PCB concentrations >48 ppm. These sample locations include CS-47, CS-54, CS-55 and CS-105. Sample locations CS-47 and CS-54 are located adjacent to each other and are situated below former AOC 2. Sample locations CS-55 and CS-105 are located adjacent to each other and are situated below former AOC 1. The sample laboratory analytical results are summarized on [Table 1](#) and their locations are depicted on [Figure 3](#).

2.4.2 Soils Exhibiting Total PCB Concentrations Between 10 and 48 ppm and Requiring Removal

A total of ten confirmatory surface soil sample results exhibited residual total PCB concentrations between 10 and 48 ppm. These sample locations are CS-10, CS-41, CS-45, CS-49, CS-84, CS-95, CS-102, CS-104, CS-106 and CS-114. Sample locations CS-45, CS-49, and CS-104 are situated below former AOC 1; sample location CS-106 is situated below both former AOCs 1 and 2; sample locations CS-41 and CS-102 are situated below former AOC 2; sample location CS-114 is situated below former AOC-3; sample location CS-95 is situated below both former AOCs 3 and 4; sample location CS-84 is situated below former AOC-4; and sample location CS-10 is located below former AOC 5. The sample laboratory analytical results are summarized on [Table 1](#) and their locations are depicted on [Figure 3](#).

3. SCOPE OF WORK

Presented within this section are the following primary components of the activities to be completed:

- Health and safety requirements
- Quality assurance/quality control protocols
- Disposal facility requirements for acceptance of waste
- Site preparation
- Excavation water management
- Loading, transportation and off Site disposal of soils exhibiting total PCBs >10 ppm
- Confirmatory soil sampling requirements
- Grading and stormwater modification plan
- On Site management of soils exhibiting total PCBs between 1 and 10 ppm
- Decontamination procedures
- Confirmatory wipe sampling procedures
- Management of ancillary wastes.

3.1 HEALTH AND SAFETY MONITORING

A Job Safety Analysis (JSA) had previously been prepared for the activities associated with the AOCs. As part of this Work Plan, the existing JSA will be updated for the activities described in this Work Plan. The JSA will be prepared in accordance with applicable general industry and construction standards of the Federal Occupational Safety and Health Administration (OSHA) and United States (U.S.) Department of Labor (DOL). The JSA will be followed by O'Brien & Gere personnel involved in the work.

Work associated with the loading of the soils for transportation off Site; placement, grading and compaction of soils remaining on Site; and conducting decontamination activities will be conducted by OSHA HAZWOPER trained operators and laborers only for those materials exhibiting total PCB concentrations greater than 48 ppm.

As required by the JSA, particulate air monitoring will be conducted during implementation of the Work Plan and the monitoring instrument readings will be recorded by O'Brien & Gere. As a means for controlling dust at the Site, and to prevent dust particles from becoming air-borne, a water truck or other water supply source will be used to wet the areas as necessary should air-borne dust be encountered. Water will be applied to mitigate air-borne dust.

3.2 QUALITY ASSURANCE/QUALITY CONTROL PROTOCOLS

O'Brien & Gere will have a full time representative on Site during the construction activities to manage and document the work being performed.

Prior to starting work, the sample locations proposed for further excavation will be demarcated utilizing stakes, flagging and marking paint to delineate the excavation limits.

The appropriate chain of custody protocols for collection of the confirmatory soil and wipe PCB samples will be followed, a prequalified New York State Department of Health (NYSDOH) Environmental Laboratory Analytical Program (ELAP)-certified laboratory will be used to perform analysis of samples, and the laboratory will provide a standard report package.

3.3 DISPOSAL FACILITY REQUIREMENTS AND APPROVAL

Soils exhibiting total concentrations of PCBs greater than 48 ppm will be loaded and transported to Chemical Waste Management's Model City Landfill (Model City), located in Lewiston, NY. The soil that will be placed as direct fill at the facility will need to be sized to a maximum dimension of 6 inches prior to loading for transportation, as required by the disposal facility.

Soil, debris and metal exhibiting total concentrations of PCBs greater than 10 but less than 48 ppm will be loaded and transported to Seneca Meadows, Inc. Landfill (Seneca Meadows), located in Waterloo, NY.

Model City will utilize the existing approved Generator Waste Profile for the soils exhibiting total PCBs >48ppm. However, as an additional requirement, Model City will require one soil sample be collected for laboratory analysis for TCLP metals. The results of this characterization sample shall be submitted to Waste Management for review. These results will be contingent upon Model City granting final approval to accept the soil. Weitsman's USEPA Hazardous Waste Generator Identification Number will be required for soil transported and disposed of at Model City.

Seneca Meadows will utilize the existing approved Generator Waste Profile for the disposal of the non-hazardous soils exhibiting total PCBs <48 ppm along with a letter from Weitsman indicating the waste materials are consistent with those already approved.

All hazardous waste trucking would be provided by Chemical Waste Management and non-hazardous waste trucking would be provided by permitted haulers, as approved by Seneca Meadows.

3.4 SITE PREPARATION

O'Brien & Gere will contact the Underground Facilities Protection Organization (UFPO, *i.e.*, Dig Safely New York) prior to conducting work at the Site.

A decontamination pad will be constructed in the southern area near the gravel access road and will be constructed of timbers and poly sheeting.

Miscellaneous vegetation, wood, metal debris and remnants of old chain link fencing along the outside perimeter edges of the Debris Pile Remediation Area will be removed, loaded, transported and disposed of off Site to Seneca Meadows as non-hazardous PCB bulk remediation debris.

Trucks will be directed to utilize the temporary gravel access road previously installed to access the confirmatory soil sample locations proposed for further excavation. The truck tires will not be allowed to come into contact with surface soils exhibiting total PCBs >1 ppm.

3.4.1 USEPA Required Gravel Access Road Extension

The temporary gravel access road previously installed to access the southern portion of the Debris Pile Remediation Area will be extended northwards to the northern perimeter's existing fence as depicted on [Figure 4](#). The access road extension will prevent truck tires from contacting surface soils exhibiting total PCBs >1 ppm within the Debris Pile Remediation Area while transporting excess soils to be placed and managed in other areas of the Site. As previously constructed, geotextile separation fabric will first be placed on the ground surface and 6 inches of washed gravel will be imported, placed and compacted.

3.4.2 Excavation Water Management and Disposal

It is envisioned that the additional excavation activities proposed herein will take place during late summer early fall 2014 and that little to no excavation water will require management.

However, should dewatering of excavations be required to allow further removal of soil, O'Brien & Gere will coordinate with Monroe County Pure Waters (MCPW) to obtain temporary authorization for proper handling, characterization and discharge. MCPW would require the following to grant approval for discharge to its storm sewer system:

- Submission of a complete MCPW permit application, including proposed sewer for discharge, planned discharge rate, approximate total volume of water to be discharged and associated soil sample/groundwater sampling data before finalizing monitoring requirements
- Payment of short-term sewer use permit and associated subsequent discharge fees
- Pump the excavation water into a frac tank, batch test, provide MCPW with analytical results, and then if below its requirements, discharge to the sewer. If carbon is required, MCPW would require periodic analytical results of the discharge to verify the carbon is effective
- Characterization and monitoring sampling requirements include PCBs via EPA Method 608, Volatile Organic Compounds via EPA Method 624, Acid-Base Neutral Extractables via EPA Method 625, Petroleum Hydrocarbons via EPA Method 1664, and the metals Cd, Cr, Cu, Ni, Pb, Zn via EPA Method 200.7.

Depending on volume, the excavation water may be managed and disposed of in an alternative fashion (via vacuum-truck) in accordance with all applicable regulations.

3.4.3 Additional Construction Fencing

Additional temporary construction fencing will be installed around the proposed areas on Site for management of PCB impacted soils. This area will be used for the placement and management of excess soils removed from the Debris Pile Remediation Area containing total PCBs between 1 and 10 ppm.

3.5 USEPA SELF-IMPLEMENTATION OF ON SITE CLEANUP AND DISPOSAL OF PCB REMEDIATION WASTE

3.5.1 Loading, Transportation and Off Site Disposal of Soils Exhibiting Over 10 ppm Total PCBs

To prevent co-mingling and cross contamination, the four AOC sample locations exhibiting PCBs greater than 48 ppm would first be loaded and transported off Site to Model City. The previous 3 meter by 3 meter representative square of each composite confirmatory soil sample location would be excavated to a depth of 3 feet below surrounding grade. Therefore an excavation approximately 10 ft. long, by 10 ft. wide by 3 ft. in depth would be advanced at each location. Given the four locations, approximately 85 cy are anticipated to be excavated and disposed of as hazardous waste. Based upon visual observations, there is little debris or metal greater than 6 inches in dimension at these locations. If debris or metal greater than 6 inches is encountered, the debris or metal would be resized in accordance with Section 3.5.2 and loaded out with the soil. Confirmatory soil samples of the excavation floor would be collected and analyzed following the procedures identified in Section 3.5.3. If soils remain above a total PCB concentration of 10 ppm, an additional appropriate depth will be excavated and the confirmatory soil sampling process repeated. Following laboratory confirmation that remaining soils exhibit total PCBs <10 ppm, the equipment utilized to load and resize the soil, debris or metal would be decontaminated utilizing the procedures identified in Section 3.8 and confirmatory wipe samples would be collected in accordance with Section 3.9.

After wipe sample confirmation that the equipment has been adequately decontaminated as evidenced by residual PCB concentrations less than or equal to 10 µg/100 cm², work would next proceed to the ten remaining confirmatory soil sample locations exhibiting total PCBs >10 ppm. Similar to above, an excavation approximately 10 ft. long, by 10 ft. wide by 3 ft. in depth would be advanced at each proposed location. Given the ten locations, approximately 228 cy are anticipated to be excavated and disposed of as non-hazardous waste. Seneca Meadows has no maximum size requirement for metal and debris. Confirmatory soil samples of the excavation floor would be collected and analyzed following the procedures identified in Section 3.5.3. If soils remain above a total PCB concentration of 10 ppm, an additional 3 ft. depth will be excavated and the confirmatory soil sampling process repeated. Following laboratory confirmation that remaining soils exhibit total PCBs <10 ppm, construction work would halt pending completion of the Site topography survey and stormwater modification design as described further below.

3.5.2 Resizing of Debris

If required, metal/debris may be resized prior to transportation and disposal. Resizing of metal/debris will be conducted using a mobile shear or torch.

3.5.3 Confirmatory Soil Sample Collection

One confirmatory soil sample will be composited from several grabs collected from the floor of each excavation. A total of 14 confirmatory soil samples are proposed. The soil sampling procedures will be conducted following the NYSDEC approved January 16, 2014 Confirmatory Soil Sampling Plan prepared by O'Brien & Gere in accordance with 40CFR, Part 761, Subpart O. The Confirmatory Soil Sampling Plan includes confirmatory sampling field activities, health and safety requirements, quality assurance/quality control protocols, soil sampling procedures, laboratory methods, decontamination procedures, management of investigation-derived waste (IDW), and proposed reporting of results.

3.5.4 Documentation and Transportation to Landfills

Following receipt of landfill approval, loads transported to Model City would be accompanied by a Hazardous Waste Manifest. The load would be weighed at the landfill, and a copy of the weight ticket and landfill-signed Hazardous Waste Manifest provided to Weitsman and NYSDEC by the landfill.

Following receipt of landfill approval, loads transported to Seneca Meadows would be accompanied by a Non-Hazardous Bill of Lading signed by Weitsman. The load would be weighed at the landfill, and a copy of the weight ticket and landfill-signed Bill of Lading provided to Weitsman and NYSDEC by the landfill.

The landfill documentation will be included as an Exhibit of the Construction Report as described in Section 5.

3.6 SITE TOPOGRAPHIC SURVEY

A licensed surveyor performed a topographic and boundary survey of the Site in August 2014. The purpose of the topographic survey was to depict ground surface elevations in the Debris Pile Remediation Area and across the Site, natural drainage characteristics, finished floor elevations of the buildings, existing Site improvements, and visible utility services such as water, natural gas, electric, storm and sanitary sewers (combined with available public utility records supplied using the Dig Safely New York service). Ground surface elevations, including high points, low points, and grade breaks were located as necessary to produce contours at a one ft. interval. The purpose of the boundary survey was to confirm the Site property lines and to stake the northeast, southwest and southeast property corners of the Site in the vicinity of the Debris Pile Remediation Area. The data collected will later assist O'Brien & Gere with Site grading and earth work calculations for cut/fill, placement and capping of residual PCB impacted soils on Site as needed to meet regulatory capping requirements in conjunction with design modifications to the Site's stormwater management plan.

3.6.1 Volume Calculations

Following the topographic survey, a volume calculation was completed to estimate the volume of soil to be removed from the Debris Pile Remediation Area to allow the top of the proposed cap to be installed at an appropriate elevation. Preliminary volume calculations indicate that approximately 3,100 cy of excess cut material will be required from the Debris Pile Remediation Area to allow for installation of the one ft. cap. This excess cut material will be transported and placed in other areas of the Site, consolidated and capped in a limited location, while accounting for proper stormwater runoff.

3.6.2 Stormwater Modification Plan

A Site Stormwater Modification Plan will be developed that incorporates the site remediation to properly manage and cap the remaining soils exhibiting total PCBs concentrations between 1 and 10 ppm and also provide proper stormwater management relative to surface runoff and discharge. The Stormwater Modification Plan is expected to include the following:

- Design of a grading plan for both the Debris Pile Remediation Area and other areas of the Site
- Design of stormwater conveyance features to accommodate reconfiguration of on site soils and capping resultant to the remediation
- Design of asphalt pavement cap system

- Final stormwater discharge is expected to be at the MCPW manhole by the existing detention pond before the railroad tracks near Ferrano St. in the northeast corner of the Site.

Following completion of the construction activities and modifications to stormwater management at the Site, revisions will be made to the existing Stormwater Pollution Prevention Plan and permit in consultation with regulatory authorities.

3.6.3 Location Placement Plan

As shown on [Figure 4](#), it is envisioned that excess cut soils exhibiting total PCBs between 1 and 10 ppm will be removed from the Debris Pile Remediation Area and transported, placed, graded and compacted in the other area(s) of the Site depending on the modifications to the Stormwater Modification Plan. Approximately 3,106 cy will be placed in these area(s) based upon preliminary estimates. Trucks will be directed to utilize the temporary gravel access road previously installed to access the soils. When dumping, the trucks will back into the proposed placement area and pull forward when empty. The truck tires will not be allowed to come into contact with surface soils exhibiting total PCBs >1 ppm.

3.7 ON SITE MANAGEMENT OF RESIDUAL SOILS EXHIBITING TOTAL PCB CONCENTRATIONS BETWEEN 1 AND 10 PPM

3.7.1 Grading, Placement and Compaction

Grading in the Debris Pile Remediation Area will begin at the southern property line and proceed northwards. Grade stakes will be installed and spot surface elevations will be measured to check that grades are being achieved. Excavated material will be loaded onto trucks located on the gravel access road for transport to other areas of the Site. As work proceeds northwards through the Debris Pile Remediation Area, the access road gravel will be transferred to be re-used as subbase for the asphalt pavement cap. Excavated areas will be backfilled and compacted in 1 ft. lifts with a vibratory roller.

3.7.2 Installation of USEPA/NYSDEC Required Cap System

Following the grading and compaction of the soils, two capping systems will be installed in accordance with 40 CFR 761.61(a)(7). The capping system will be comprised of asphalt except on the sloped eastern boundary which will accommodate only gravel. Presented on [Figure 5](#) are the anticipated areas of the two capping systems including conceptual cross-sections of each.

As shown on [Figure 5](#), the asphalt cap will be installed across the Debris Pile Remediation Area and across the management area(s) located in other areas of the Site. The asphalt cap will be more suitable to operations for sustainability and to comply with USEPA requirements. The gravel cap will only be placed on the eastern slope in AOC-5 which encompasses the area currently titled to the adjacent railroad which cannot accommodate asphalt.

3.8 DECONTAMINATION PROCEDURES

The method of decontaminating the equipment buckets, roller, grapple or resizing equipment between use at locations of higher total PCB concentrations to those of lower total PCBs, as well as moving equipment between impacted areas on the Site, and also upon project completion. The equipment would be decontaminated between locations first using potable water and a high pressure steam cleaner. Decontamination fluids would be discharged over and onto the decontamination pad. The equipment bucket would undergo a final decontamination/confirmation procedure using an acetone double wash/rinse as defined in subpart S of 40 CFR 761, followed by the collection of one wipe sample to be submitted for laboratory analysis of PCBs. The final decontamination would be conducted over a decontamination pad constructed of poly and timbers. After confirmation from the laboratory that the equipment is decontaminated, the equipment would be released to work at the next location. In the event excavation water is managed via frac tanks or vacuum truck, additional decontamination procedures may be required per the frac tank rental or vacuum truck companies. Spent decontamination fluids and used poly and timbers would be staged and properly labeled. The spent solvent and used poly and timbers would be transported and disposed at a permitted facility.

3.9 CONFIRMATORY WIPE SAMPLES

Following the acetone double wash/rinse final decontamination procedure of the equipment bucket, grapple, or resizing equipment, O'Brien & Gere would collect a confirmatory wipe sample from each piece of equipment. A 10 centimeter by 10 centimeter dedicated cardboard template would first be placed on the inside of the bucket or grapple "finger". The laboratory provided wipe will then be vigorously scrubbed across the area in both the horizontal and vertical directions. The wipe will then be placed back into its sample jar and transported to the laboratory for analysis.

No trip blanks or QA/QC samples will be collected. Samples collected will be analyzed using USEPA SW-846 methods for PCBs. The laboratory analysis will be completed by Paradigm Environmental Services, Inc. (Paradigm) located in Rochester, NY, with an expedited turnaround time of 24 hours. Paradigm's ELAP number is 10958.

The laboratory will provide a standard report package. In addition the laboratory will provide the data in electronic format for incorporation into a database, which will be used to generate tables and figures for the Construction Report. The analytical results will be included as an Exhibit of the Construction Report.

3.10 MANAGEMENT OF ANCILLARY WASTES

3.10.1 General

The remediation activities are anticipated to generate ancillary waste which will require appropriate management in accordance with state and federal regulations (Title 40 of the Code of Federal Regulations [CFR] Parts 239 through 279 and Title 6 of New York Codes, Rules and Regulations [6 NYCRR] Chapter IV, Subchapter B Parts 360 through 376). The anticipated ancillary wastes include the following:

- Decontamination fluids and decontamination pad construction materials resulting from decontamination of equipment
- Hay bales, fencing and metal posts
- Used personal protective equipment (PPE) resulting from the execution of field activities
- General refuse.

The management of these wastes is discussed below.

3.10.2 Decontamination Fluids and Pad Materials

Currently, there is one 55-gallon drum of decontamination pad construction materials and one 55-gallon drum of decontamination fluids and acetone staged at the Site from the previous characterization event.

The existing drum of decontamination pad materials will be emptied of the poly and timbers and these materials will be disposed of with the proposed soils to be further excavated. The new decontamination pad construction materials (timber and poly sheeting) will be placed in a 55-gallon drum after receipt of PCB wipe sample confirmation. These materials will later be disposed of with the fencing, hay bales and metal posts described below.

The decontamination fluids used during the remedial construction activities would be added to the existing 55-gallon drum containing decontamination fluids. At the end of the remedial construction activities, the fluids drum will be transported and disposed of at a properly permitted facility.

3.10.3 Hay Bales, Fencing and Metal Posts

The existing hay bales, construction fencing and metal posts will be loaded and transported to Seneca Meadows for disposal near the end of the project, just before the asphalt paving commences.

3.10.4 PPE and Associated Materials

Used PPE and associated materials will be placed in trash bags as appropriate and disposed of with the Site's solid waste (*e.g.*, the Site's dumpster).

3.10.5 General Refuse

General refuse will be placed in trash bags and disposed of in appropriate waste receptacles (*e.g.*, the Site's dumpster).

4. PROJECT PERSONNEL

The personnel for this project are anticipated as follows:

Name and Title	Telephone
NYSDEC Key Personnel	
Michael Khalil, P.E. Environmental Engineer II Region 8 Avon, New York	(585) 226-5415
USEPA Key Personnel	
James Haklar Regional PCB Coordinator / PCB Disposal Edison, New Jersey	(732) 906-6817
O'Brien & Gere Key Personnel	
Paul Mazurkiewicz, P.E. Project Officer Syracuse, New York	(315) 956-6442
Kevin Ignaszak, P.E. Project Manager Rochester, New York	(585) 295-7709 (585) 752-6611 (cell)
Jeff Parsons Corporate Associate for Safety and Health Syracuse, New York	(315) 956-6070 (315) 391-0638 (cell)
Logan Reid Scientist/Field Team Leader Rochester, New York	(585) 295-7717 (516) 780-1894 (cell)
Subcontractors	
Analytical Laboratory: Paradigm Environmental Services, Inc. Rochester, New York	(585) 647-2530
Disposal Facilities	
Hazardous PCBs > 48 ppm: Chemical Waste Management Model City Landfill Lewiston, New York Contact: Sue Rossi Waste Management Bergen, New York	
Non-Hazardous PCBs < 48 ppm Seneca Meadows, Inc. Waterloo, New York Contact: David Panucci	(585) 259-9408
NOTE: Other permitted landfills may be used for disposal.	
Loading Equipment/Excavator/Loader to be provided by Weitsman and operated by O'Brien & Gere construction personnel	
Weitsman Key Personnel	
Aaron Weiner General Manager Rochester, New York	(585) 254-0360

5. REPORT

Following completion of the activities described in this Work Plan, a Construction Report will be prepared. Specific information to be contained in the Construction Report is as follows:

- Introduction including the purpose and organization of the report
- Site history
- A description of the PCB remediation activities conducted at the Site since November, 2013
- Conclusions.

Relevant supporting data including disposal related documentation will be appended to the report and is expected to include: Site Photographs, Generator Waste Profiles, Disposal Facility Approvals, Weigh Tickets, Bills of Lading, Hazardous Waste Manifests and the confirmatory wipe sample analytical reports. The Construction Report will be submitted to the NYSDEC and USEPA for review and approval.

5.1 SITE MANAGEMENT PLAN

Engineering Controls comprised of asphalt and gravel capping systems, along with appropriate deed restriction, have been incorporated into the Site remedy to control exposure to remaining PCBs during the use of the Site to ensure protection of public health and the environment. Since residual PCBs between 1 and 10 ppm in soils will remain on Site, a site-specific Site Management Plan (SMP) will be prepared. The SMP will be prepared following the guidance set forth in the NYSDEC, Division of Environmental Remediation, Soil Management Plan Template, February, 2013.

The deed restriction will also place restrictions on Site use. The SMP will include the necessary tasks required to maintain the operation, maintenance, monitoring and reporting measures for the deed restriction and capping systems. The SMP will be submitted for review and approval by the NYSDEC.

6. SCHEDULE

Following formal approval of the Work Plan by the USEPA, it is estimated the field work will take eight to ten weeks to complete and will commence in October, 2014. Within eight weeks following the completion of field activities, and contingent upon receipt of disposal related documentation from the landfills, O'Brien & Gere anticipates submitting a draft Construction Report for review by the USEPA and NYSDEC.

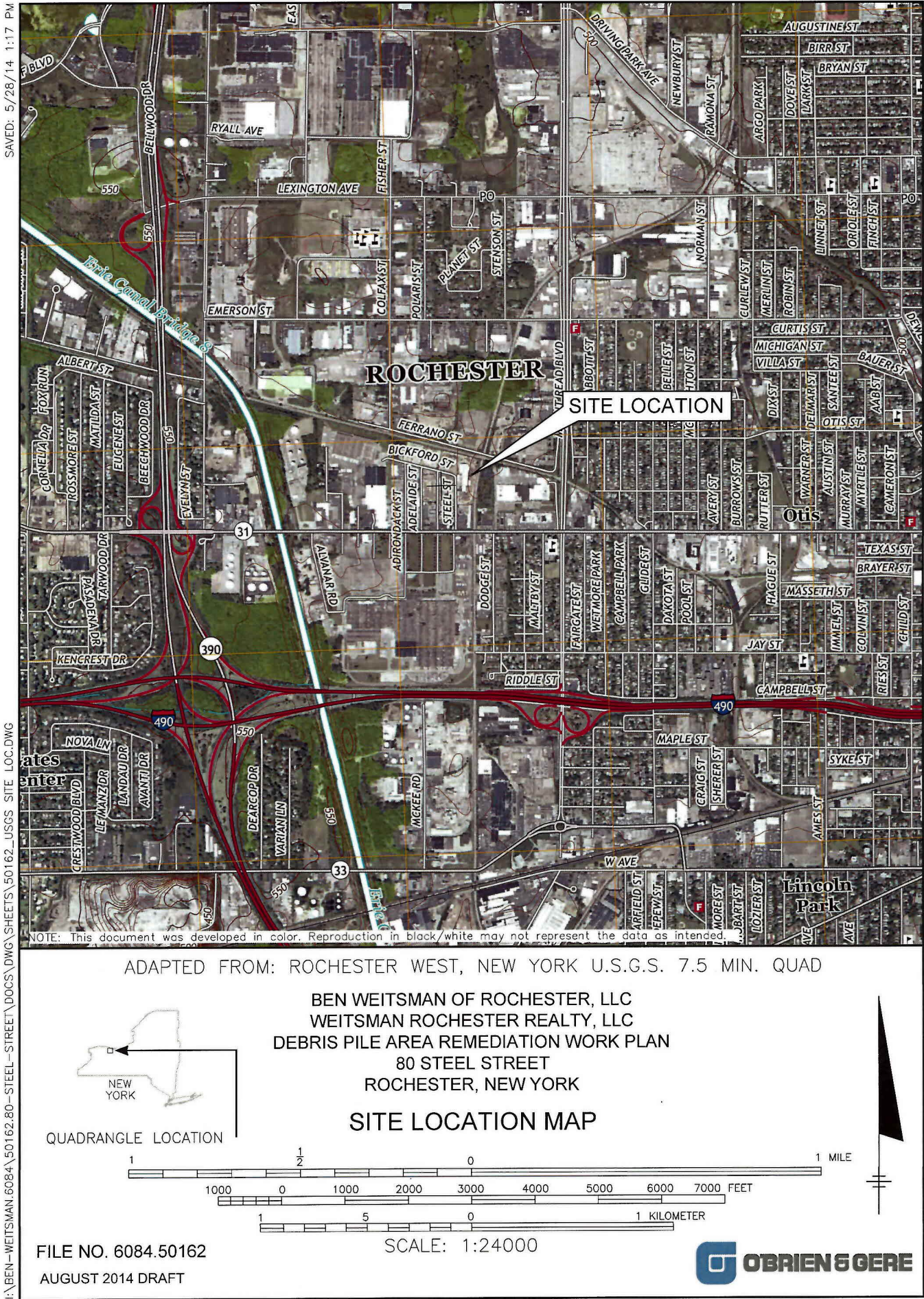
Tables

Table 1
Summary of Confirmatory Soil Sampling Locations
and Results Requiring Further Excavation
Debris Pile Area Remediation Work Plan
80 Steel Street
Rochester, New York

Sample Identification							CS-010-021014	CS-041-021814	CS-045-021814	CS-047-021814	CS-049-021814	CS-054-021914	CS-055-021914	CS-084-031014	CS-095-031114	CS-102-031114	CS-104-031114	CS-105-031114	CS-106-031114	CS-114-041014
Sample Date							2/10/2014	2/18/2014	2/18/2014	2/18/2014	2/18/2014	2/19/2014	2/19/2014	3/10/2014	3/11/2014	3/11/2014	3/11/2014	3/11/2014	3/11/2014	4/10/2014
Sample Time							1540	1145	1440	1458	1525	1240	1300	1519	1024	1302	1312	1318	1323	1000
Analyte	Cas No.	Units	USEPA Part 761.61 "High Occupancy Area" Soil Cleanup Level	Part 375 Protection of Groundwater SCO	Part 375 Industrial Use SCO	Part 375 Residential Use SCO	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result
PCBs	PCB- 1016**	12674-11-2	mg/kg	NA	NA	NA	<0.776	<3.07	<4.20	<56.7	<2.05	<27.2	<11.1	<0.955	<0.537	<2.11	<0.477	<3.86	<2.27	<0.489
	PCB- 1221**	11104-28-2	mg/kg	NA	NA	NA	<0.776	<3.07	<4.20	<56.7	<2.05	<27.2	<11.1	<0.955	<0.537	<2.11	<0.477	<3.86	<2.27	<0.489
	PCB- 1232**	11141-16-5	mg/kg	NA	NA	NA	<0.776	<3.07	<4.20	<56.7	<2.05	<27.2	<11.1	<0.955	<0.537	<2.11	<0.477	<3.86	<2.27	<0.489
	PCB- 1242**	53469-21-9	mg/kg	NA	NA	NA	<0.776	<3.07	23.5	<56.7	<2.05	<27.2	145	<0.955	6.66	11.4	<0.477	<3.86	<2.27	<0.489
	PCB- 1248**	12672-29-6	mg/kg	NA	NA	NA	5.06	14.4	<4.20	270	12.2	94.5	<11.1	12.6	8.73	33.0	6.26	51.7	16.7	5.92
	PCB- 1254**	11097-69-1	mg/kg	NA	NA	NA	6.61	19.8	<4.20	<56.7	7.35	42.6	<11.1	5.0	<0.537	<2.11	5.03	17.1	15.7	5.21
	PCB- 1260**	11096-82-5	mg/kg	NA	NA	NA	<0.776	<3.07	<4.20	<56.7	<2.05	<27.2	<11.1	<0.955	<0.537	<2.11	<0.477	<3.86	<2.27	<0.489
	PCB- 1262**	37324-23-5	mg/kg	NA	NA	NA	<0.776	<3.07	<4.20	<56.7	<2.05	<27.2	<11.1	<0.955	<0.537	<2.11	<0.477	<3.86	<2.27	<0.489
	PCB- 1268**	11100-14-4	mg/kg	NA	NA	NA	<0.776	<3.07	<4.20	<56.7	<2.05	<27.2	<11.1	<0.955	<0.537	<2.11	<0.477	<3.86	<2.27	<0.489
	Total PCB's	NA	mg/kg	1	3.2	25	1	11.670	34.200	23.500	270.000	19.550	137.100	145.000	17.600	15.390	44.400	11.290	68.800	32.400

Figures

FIGURE 1



NOTES:
1. ALL LOCATIONS SHOWN ARE APPROXIMATE.

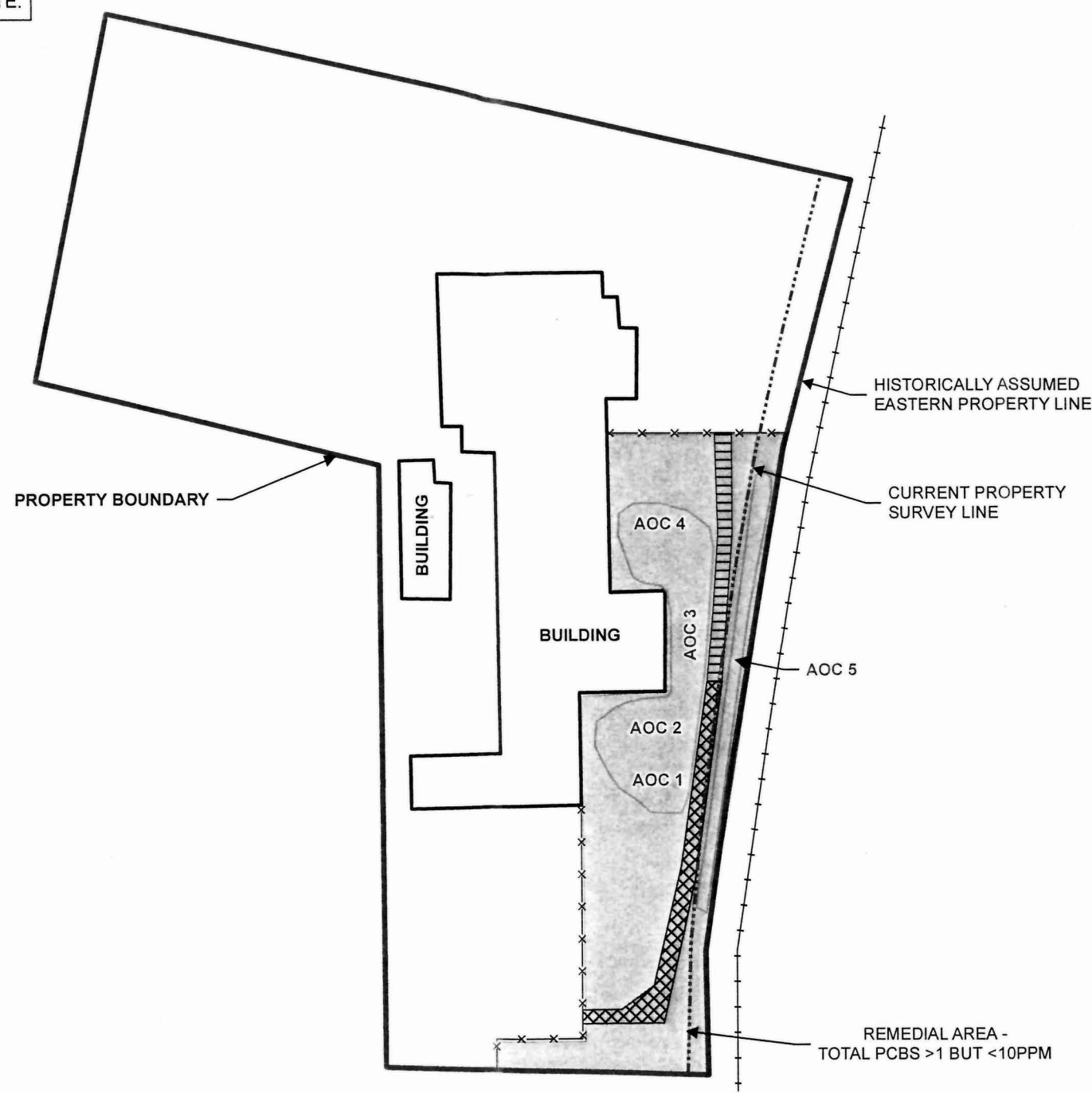


FIGURE 2

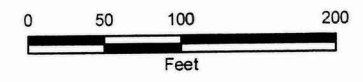


LEGEND

- × CONSTRUCTION FENCING AND HAY BALES
- +— RAILROAD
- REMEDIAL AREA - TOTAL PCBs >1 BUT < 10PPM
- EXISTING GRAVEL ROAD
- PROPOSED GRAVEL ROAD EXTENSION
- CURRENT PROPERTY SURVEY LINE
- APPROXIMATE PROPERTY BOUNDARY
- APPROXIMATE FORMER AOC LOCATIONS

BEN WEITSMAN OF ROCHESTER, LLC
WEITSMAN ROCHESTER REALTY, LLC
WORK PLAN
DEBRIS PILE AREA REMEDIATION
80 STEEL STREET
ROCHESTER, NEW YORK

EASTERN
PROPERTY LINE
INFORMATION



AUGUST 2014
6084 50162

NOTES:

1. GRID SPACING IS 1.5M (4.922-FEET).
2. ALL LOCATIONS ARE APPROXIMATE.
3. CONFIRMATORY SOIL SAMPLES EXHIBITING TOTAL PCBs >48 PPM INCLUDE CS-47, CS-54, CS-55 AND CS-105.
3. CONFIRMATORY SOIL SAMPLES EXHIBITING TOTAL PCBs >10 PPM BUT ≤48 PPM INCLUDE CS-10, CS-41, CS-45, CS-49, CS-84, CS-95, CS-102, CS-104, CS-106 AND CS-114.

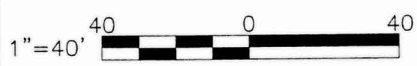


LEGEND

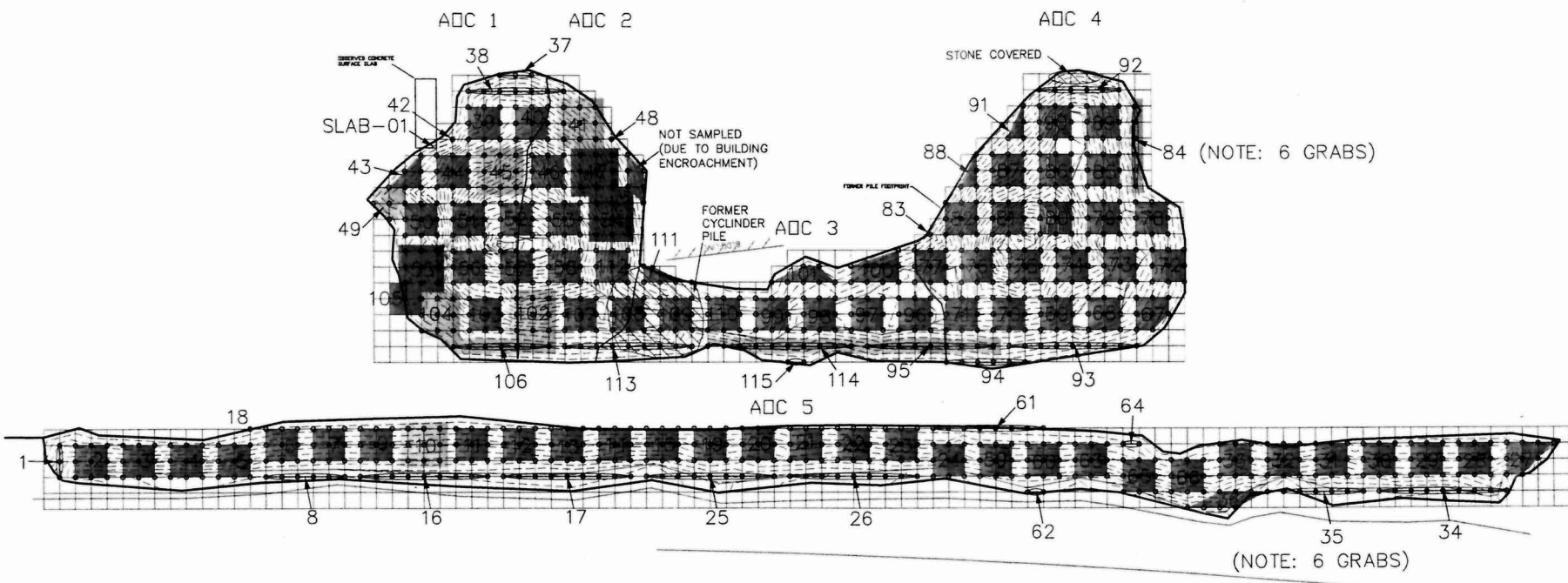
- PROPOSED EXCAVATION WITH TOTAL PCBs >10 BUT ≤48 PPM (NON-HAZARDOUS)
- PROPOSED EXCAVATION WITH TOTAL PCBs ≥48 PPM (HAZARDOUS)
- PREVIOUSLY COLLECTED - 1 GRAB SAMPLE FROM GRID INTERSECTS
- PREVIOUSLY COLLECTED - 1 COMPOSITE "LINEAR" SAMPLE FROM A MAXIMUM OF 9 GRABS AT GRID INTERSECTS
- PREVIOUSLY COLLECTED - 1 COMPOSITE SAMPLE FROM UP TO 9 GRABS AT GRID INTERSECTS
- QUADRANT BOUNDARY
- 1 PREVIOUSLY COLLECTED - CONFIRMATORY SAMPLE NUMBER

BEN WEITSMAN OF ROCHESTER, LLC
WEITSMAN ROCHESTER REALTY, LLC
WORK PLAN
DEBRIS PILE AREA REMEDIATION
80 STEEL STREET
ROCHESTER, NEW YORK

PROPOSED LOCATIONS
FOR FURTHER
EXCAVATION AND
OFF-SITE DISPOSAL



FILE NO. 6084 50162
AUGUST 2014



NOTES:
 1. ALL LOCATIONS SHOWN ARE APPROXIMATE.
 2. CUT AND FILL LOCATIONS, AND POTENTIAL AREAS FOR PLACEMENT OF MATERIALS FOR TOTAL PCBS >1 BUT <10PPM, ARE CONTINGENT UPON FINAL VOLUMES AND DESIGN OF STORMWATER MODIFICATION PLAN.

EXISTING CONCRETE PAD

PROPERTY BOUNDARY

BUILDING

BUILDING

POTENTIAL AREAS FOR PLACEMENT OF MATERIALS FOR TOTAL PCBS >1 BUT <10PPM

WITHIN THESE AREAS, POTENTIAL AREAS FOR PLACEMENT OF MATERIALS FOR TOTAL PCBS >1 BUT <10PPM WILL BE LIMITED TO AN ESTIMATED 100,000 SQUARE FEET.

AOC 4

AOC 3

AOC 2

AOC 1

SLOPED EMBANKMENT

AOC 5

SLOPED EMBANKMENT

NOTE: SUBGRADE CONCRETE STRUCTURE TO REMAIN IN PLACE

SLOPED EMBANKMENT

REMEDIAL AREA - TOTAL PCBS >1 BUT <10PPM

FIGURE 4

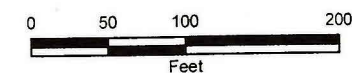


LEGEND

- ×— CONSTRUCTION FENCING AND HAY BALES
- +— RAILROAD
- ANTICIPATED AREA FOR PLACEMENT OF MATERIALS FOR TOTAL PCBS >1 BUT <10PPM
- REMEDIAL AREA - TOTAL PCBS >1 BUT <10PPM
- EXISTING GRAVEL ROAD
- PROPOSED GRAVEL ROAD EXTENSION
- APPROXIMATE PROPERTY BOUNDARY
- APPROXIMATE FORMER AOC LOCATIONS

BEN WEITSMAN OF ROCHESTER, LLC
 WEITSMAN ROCHESTER REALTY, LLC
 WORK PLAN
 DEBRIS PILE AREA REMEDIATION
 80 STEEL STREET
 ROCHESTER, NEW YORK

POTENTIAL LOCATIONS OF ON-SITE MANAGEMENT OF PCBS



AUGUST 2014
 6084 50162

NOTES:
1. ALL LOCATIONS SHOWN ARE APPROXIMATE.
2. FINAL CAP LOCATIONS CONTINGENT UPON FINAL VOLUMES, STORMWATER MODIFICATION PLAN AND POTENTIAL AREAS FOR PLACEMENT OF MATERIALS FOR TOTAL PCBs >1 BUT < 10PPM.

WITHIN THESE AREAS, POTENTIAL AREAS FOR PLACEMENT OF AN ASPHALT CAP WILL BE LIMITED TO AN ESTIMATED 100,000 SQUARE FEET

EXISTING CONCRETE PAD

PROPERTY BOUNDARY

BUILDING

BUILDING

SLOPED EMBANKMENT

SLOPED EMBANKMENT

SLOPED EMBANKMENT

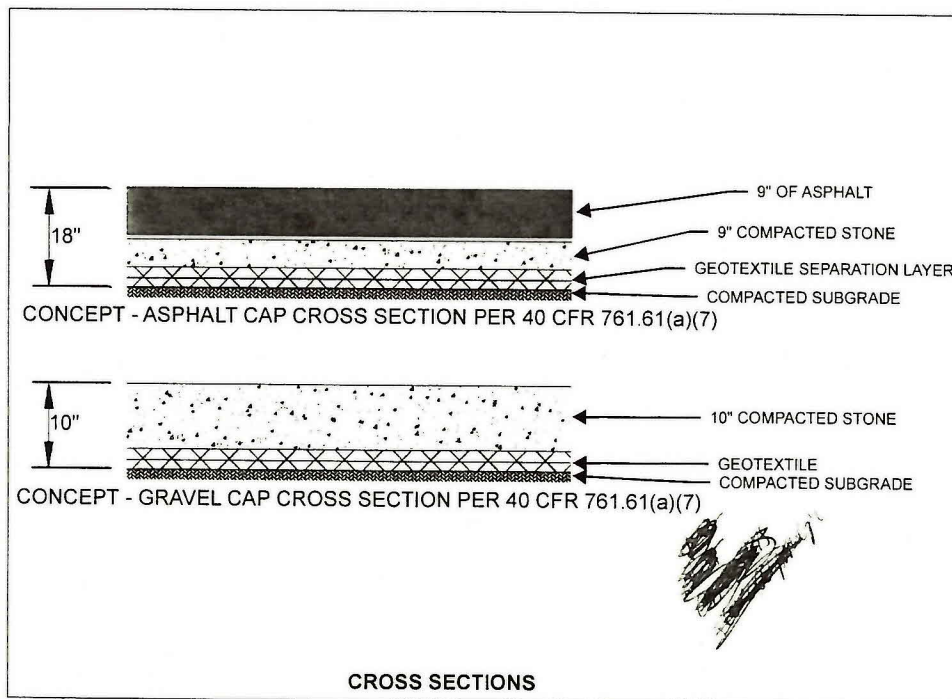


FIGURE 5

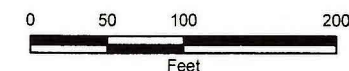


LEGEND

- RAILROAD
- POTENTIAL AREAS OF ASPHALT CAP
- ANTICIPATED AREA OF 10" GRAVEL CAP
- APPROXIMATE PROPERTY BOUNDARY
- APPROXIMATE FORMER AOC LOCATIONS

BEN WEITSMAN OF ROCHESTER, LLC
WEITSMAN ROCHESTER REALTY, LLC
WORK PLAN
DEBRIS PILE AREA REMEDIATION
80 STEEL STREET
ROCHESTER, NEW YORK

PROPOSED CAP SYSTEM
AND CROSS SECTIONS



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